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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH  
CENTRAL DIVISION**

In re:  ALLAN ANOPOL CHRISTINA BETH ANOPOL  Debtors.	Case No. 10-35735 Chapter 13 Judge R. Kimball Mosier <i>Hearing April 3, 2013 at 11:00 a.m.</i>
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**TRUSTEE'S RESPONSE TO DEBTORS' MOTION  
TO SHORT-SALE REAL PROPERTY**

Kevin R. Anderson, Chapter 13 Trustee, by and through counsel, hereby responds to the above-referenced Motion as follows:

1. As of the date of this response, the Debtors are current on plan payments.
2. Prior to the hearing, the Debtors should file an amended budget evidencing the ability to make ongoing plan payments and the new living expenses.
3. The Debtors should file a change of address as soon as practicable after relocation.
4. The Trustee shall be allowed a fee on any prepetition mortgage arrearages, taxes or other encumbrances that are paid directly by the closing agent that otherwise would have been

paid by the Trustee through the Plan. The Trustee shall be entitled to immediate payment of such fee based on the distribution to these creditors.

5. If the Court grants the Motion, the Trustee requests a copy of the settlement statement and/or closing documents within three days of the loan closing.

6. The Trustee objects to payment of any attorney's fees either through the Chapter 13 plan or paid directly by the closing agent because the Motion does not comply with 11 U.S.C. § 330 or Fed. R. Bankr. P. 2016.

WHEREFORE, the Trustee objects to entry of an Order granting the relief requested in the Motion.

DATED: March 21, 2013.

/s/ Laura J. Jones  
LAURA J. JONES  
Attorney for Chapter 13 Trustee

#### **CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing paper was served on the following person on March 21, 2013

MARJI HANSON  
ECF Notification

/s/ M. Moses  
Office of the Chapter 13 Trustee